

# **EXHIBIT B**

**From:** [Christine Burke](#)  
**To:** [Norwillo, Haley](#)  
**Cc:** [Hank, Matthew](#); [Laborda Nelson, Alexa](#); [Erin McVicar](#)  
**Subject:** Re: Christian\_Omnis Confidentiality Agreement, Meet and Confer  
**Date:** Wednesday, July 9, 2025 10:45:28 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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Hi Haley -

I have not seen a shred of evidence supporting any after acquired evidence defense. It is illegal to terminate an employee for preserving evidence of a potential crime and complying with local, state or federal investigations into such crimes. You also can't claim breach of a contractual provision which is void against public policy.

Please file your Motion.

Christine

On Wed, Jul 9, 2025 at 10:27 AM Norwillo, Haley <[HNorwillo@littler.com](mailto:HNorwillo@littler.com)> wrote:

Good Morning Christine,

I followed up with Erin in a separate email to reschedule the meet and confer, thank you. Regarding the after-acquired evidence affirmative defense, do we have your consent to amend the answer? If we don't hear back from you on this by end of day Friday, we will begin drafting a motion. Thank you in advance for your time.

Best,

Haley

**Haley Norwillo**

**Attorney at Law**

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[HNorwillo@littler.com](mailto:HNorwillo@littler.com)

Pronouns: She/Her



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**From:** Norwillo, Haley  
**Sent:** Wednesday, July 2, 2025 1:01 PM  
**To:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa <[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>  
**Subject:** RE: Christian\_Omnis Confidentiality Agreement, Meet and Confer

Good Afternoon Christine,

I hope you had a nice vacation. We are writing to inform you that we have had something come up on July 11<sup>th</sup> and can no longer meet and confer then. When you have a moment, can you please let us know your availability to meet and confer the week of the 14<sup>th</sup>?

Further, we would like to assert an after-acquired evidence affirmative defense based on the facts asserted in the Arbitration Demand. Do we have your consent to amend the answer to include this affirmative defense, or should we file a motion? Please let us know.

Best,

Haley

**Haley Norwillo**

**Attorney at Law**

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Pronouns: She/Her



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**From:** Norwillo, Haley  
**Sent:** Friday, June 27, 2025 5:32 PM  
**To:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa <[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>  
**Subject:** RE: Christian\_Omnis Confidentiality Agreement, Meet and Confer

Hi Christine,

Busy month indeed! I'll send an invite for 2pm on the 10<sup>th</sup>, if that doesn't work please let us know. Thank you.

Best,

Haley

**Haley Norwillo**

**Attorney at Law**

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**From:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Sent:** Friday, June 27, 2025 1:51 PM  
**To:** Norwillo, Haley <[HNorwillo@littler.com](mailto:HNorwillo@littler.com)>  
**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa <[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>  
**Subject:** Re: Christian\_Omnis Confidentiality Agreement, Meet and Confer

7/10 works; any time in the afternoon as I have an in person R. 16 that morning.

(7/7 I am in an all day plaintiff's dep and 7/8 I am in person with Judge Wells all day for a settlement conf). Busy month!

On Fri, Jun 27, 2025 at 12:41 PM Norwillo, Haley <[HNorwillo@littler.com](mailto:HNorwillo@littler.com)> wrote:

Hi Christine,

I hope all is well. Do you have any availability for a meet and confer on July 7<sup>th</sup>, 8<sup>th</sup>, or 10<sup>th</sup>? Please let us know, and thank you in advance for your time.

Best,

Haley

**Haley Norwillo**

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**From:** Norwillo, Haley  
**Sent:** Tuesday, June 24, 2025 11:11 AM  
**To:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa <[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>  
**Subject:** RE: Christian\_Omnis Confidentiality Agreement, Meet and Confer

Good Morning Christine,

I hope all is well. I know you mentioned you were on vacation, but I'm just bringing the below inquiry to the top of your email box. Thank you.

Best,

Haley

**Haley Norwillo**

**Attorney at Law**

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**From:** Norwillo, Haley  
**Sent:** Monday, June 16, 2025 8:32 PM

**To:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa  
<[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>  
**Subject:** RE: Christian\_Omnis Confidentiality Agreement, Meet and Confer

Good Evening Christine,

No problem, I hope you had a nice weekend. It is our understanding that, per the attached email, the parties have already agreed to this confidentiality agreement. We are just waiting for your signature.

And, just to be clear, the fact that we identify something as confidential does not mean it can be filed under seal per *Pansy*. Thank you in advance for your consideration.

Best,

Haley

**Haley Norwillo**

**Attorney at Law**

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The logo for Littler, featuring the word "Littler" in a bold, green, sans-serif font. A small blue dot is positioned above the second 'i'.

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**From:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Sent:** Friday, June 13, 2025 4:08 PM

**To:** Norwillo, Haley <[HNorwillo@littler.com](mailto:HNorwillo@littler.com)>

**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa  
<[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>

**Subject:** Re: Christian\_Omnis Confidentiality Agreement, Meet and Confer

Hi Haley -

We would not agree to any blanket confidentiality agreement in the case. If there is something specific you believes is governed by Pansy, please let us know so I can adequately assess whether it would meet the Pansy factors.

Separately, I am sorry for not getting back to you sooner, I am dealing with urgent post trial motions before I leave for vacation next week.

I am available for a meet and confer with you and/or Matt July 1st, 2nd, 3rd or the following week.

Thank you -

Christine

On Thu, Jun 12, 2025 at 5:55 PM Norwillo, Haley <[HNorwillo@littler.com](mailto:HNorwillo@littler.com)> wrote:

Good Evening Christine,

I hope all is well. I'm just writing to see if you've had a chance to execute the confidentiality agreement, attached here for ease of reference. We have a production of Ms. Christian's responsive emails ready.

Additionally, please let us know of your availability tomorrow and early next week so we can schedule a meet and confer. Thank you in advance for your time.

Best,

Haley



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**From:** Norwillo, Haley

**Sent:** Tuesday, June 10, 2025 10:21 AM

**To:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>

**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa  
<[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>

**Subject:** RE: Christian\_Omnis Confidentiality Agreement, Meet and Confer

Good Morning Christine,

Just writing to follow up on your execution of the confidentiality agreement, attached here for ease of reference. Additionally, when are you available this week for a meet and confer? Thank you.

Best,

Haley

**Haley Norwillo**

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**From:** Norwillo, Haley  
**Sent:** Friday, June 6, 2025 6:11 PM  
**To:** Christine Burke <[cburke@karpf-law.com](mailto:cburke@karpf-law.com)>  
**Cc:** Hank, Matthew <[MHank@littler.com](mailto:MHank@littler.com)>; Laborda Nelson, Alexa  
<[ALabordaNelson@littler.com](mailto:ALabordaNelson@littler.com)>; Erin McVicar <[erin@karpf-law.com](mailto:erin@karpf-law.com)>  
**Subject:** Christian\_Omnis Amended Responses to Plaintiff's RPDs and Confidentiality Agreement

Good Evening,

Attached please find the Omnis Parties' Amended Responses to Plaintiff's Requests for Production. Additionally, attached for your signature please find the proposed confidentiality and clawback agreement. Thank you.

Best,

Haley

**Haley Norwillo**

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Very truly yours,

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